

Deficiency Status Report 5

Status Report Submitted: 1-31-08

CUPA Name: Los Angeles City Fire Department

Evaluation Date: April 12 and 13, 2006

Next Status Report Due: December 20, 2007

State Evaluation Team:

Cal/EPA Team Leader: Kareem Taylor

OES Evaluator: Fred Mehr

SWRCB Evaluator: Marci Christofferson

Based on the CUPA's corrective action responses, the following deficiencies are considered corrected and no further updates are required: 1, 2, 3, 5

Please update the deficiencies below that remain in progress.

Deficiencies and Corrective Actions

- 4. Deficiency:** The UST operating permit does not contain the monitoring options used for the tank and piping systems or have a statement that the monitoring, response, and plot plans are to be maintained on site with the permit.

Preliminary Corrective Actions: Include how the tank and piping systems are monitored on the operating permit, and verbiage that states that the approved monitoring, response, and plot plans are to be maintained on site with the permit.

CUPA's 3rd Status Update: This has been done. Refer to information on submitted status report #3.

Cal/EPA's 3rd Response: The information submitted with the 3rd status report was not adequate to correct this deficiency. Please refer to the attachment for water board's comments. Please submit an updated UST operating permit to Cal/EPA by August 16, 2007.

CUPA's 4th Status Update: Deficiencies 1, 2, 3, 5, and part of 4 have been corrected. The Los Angeles City Fire Department is currently in correspondence with Mr. Kareem Taylor (CalEPA/ Unified Program) to rectify deficiency #4. As discussed on September 12, 2007 during our teleconference with Mr. Taylor, Los Angeles City Fire Department will

continue to work towards the resolution of this deficiency. The following procedures will be used as a roadmap to develop a form in Envision to fulfill the State Water Resource Control Board (SWRCB) requirement.

1. Meet with our Management Information Systems (MIS) to discuss the development of a form in Envision that will fulfill the SWRCB required information.
 - a. *On September 18, 2007, the Los Angeles Fire Department met with MIS to discuss the development of the form with the required UST and piping monitoring information. MIS was informed that this table would be a third page to the existing operating permit. MIS indicated that during the next two weeks they would be checking to see if the required fields exist in Envision and looking into how long it will take to generate such a form.*
2. Once the form has been generated it will be provided to Mr. Taylor and the SWRCB for comments and recommendations.
3. Then, a blank approved form will then be provided to the UST tank operators to be filled and submitted with their UST monitoring reports. If resources are available the existing UST monitoring reports will be used to populate the forms.
4. The final step will be to include the form with the UST and piping monitoring information as an attachment to the operating permit.

Cal/EPA's 4th Response: The CUPA is currently developing a form through Envision that will include all of the monitoring requirements. The form will be included with the permit to operate. When the form is completed, the CUPA will submit it to Cal/EPA for approval. Any form information that can be populated from UST forms already submitted by UST facilities must be entered by the CUPA. Cal/EPA appreciates the CUPA's proactive approach to correcting this deficiency.

CUPA's 5th Status Update:

Since our 4th Status Report our Management Information Systems personnel researched in Envision and were able to identify the majority of the fields required in the sample table provided by SWRCB/CalEPA. The majority of the information for the required fields was found in several Envision Screens/Tabs. MIS created a UDF Table (**Table 1**) in Envision

to mirror the sample table provided by the State Water Resource Control Board.

The screenshot shows a software window titled "TANKMONITORINGINFO". At the top, there is a "Parent ID" field with the value "ITA0001603". Below this, the window is divided into two main sections: "TANK SYSTEM" and "PIPING SYSTEM".

TANK SYSTEM fields:

- UL # : [text box]
- SYSTEM ID : [text box]
- CONSTRUCTION : [dropdown menu]
- CAPACITY : [text box] gallons
- SUBSTANCE : [dropdown menu]
- MONITORING INFO : [dropdown menu]
- FREQUENCY : [dropdown menu]
- OVERFILL : [dropdown menu]
- SPILL CONTAINER : [dropdown menu]
- CATHODIC PROTECTION : [dropdown menu]

PIPING SYSTEM fields:

- PIPING CONSTRUCTION : [text box]
- TYPE OF SYSTEM : [text box]
- LINK LEAK DETECTOR : [text box]
- UDC MONITORING : [text box]
- TURB SUMP MONITOR : [text box]
- AUTOTURBINE SHUTDOWN : [text box]
- VAPOR RECOVERY PIPING : [text box]
- FREQUENCY : [text box]

Table 1, Envision UDF Table

In addition, Decade was contacted to find out if Envision had a Canned Report that would meet the SWRCB/CalEPA requirements. Decades' response was that if the report was not a form required by CalEPA or the Water Board then they did not have it as a Canned Report. Decade was also informed about our UDF Table created by MIS and how the Fire Department intended to use it.

Decade did not recommend to populate the created UDF Table in Envision 3.4 at this time since it we would be recreating and repopulating the same table again once the Fire Department migrates to Envision Connect some time in June 2008.

Further more, Decade was asked if a form like this would be available in Envision Connect. Their response was no, but once we migrate to Envision Connect Decade would be able to customize **Table 1** to meet our needs and fulfill the SWRCB/CalEPA requirements.

While we wait for the migration to Envision Connect a copy of Table 1 will be provided to the UST owners to fill out and submit along with their Annual UST Monitoring Certifications. As soon as we upgrade to Envision connect the newly created table will be populated with the gathered information. Once all the data has been collected and entered in the new tables it will be included and mailed along with the permit to operate.

Cal/EPA's 5th Response: Refer to SWRCB comments. Cal/EPA recommends that the CUPA include the newly approved monitoring plan form (Form D) with the permit to operate for each UST facility. The new form contains all of the monitoring requirements that need to be included with the permit. This option or the others mentioned below by the SWRCB would be acceptable to correct this deficiency. Cal/EPA accepts that any option chosen by the CUPA is only temporary until the Envision Connect database is fully able to populate the monitoring information directly onto the facility permits.

SWRCB's comments: All of the monitoring information that should be on the operating permit is contained in the A, B & D forms submitted by the UST owner/operator. The UST owner should NOT have to fill out additional forms as suggested, as it is duplicative information. Since the new form D (Monitoring Plan) is now in regulation, LA City could make a copy of the approved monitoring plan and provide it to the permittee instead of putting the information on the permit itself, although, it would be a larger permit package.

Alternately, the permit could be printed using a report from Envision (or Envision Connect) using all of the information needed. The data elements in Envision should be (or soon will be) the same as contained on the new forms. Of course, the permit would need to be a report developed by Envision, unless the user can develop reports of their own.

A third option would be for the CUPA to have a permit template and type in the information needed for each permit. This is time consuming, but, would get the job done.

If using Envision Connect is the preferred method for correcting this deficiency, LA City Fire should provide a copy of a permit showing all of the required elements to CalEPA and SWRCB.

Note: Include "pipe monitoring" on the permit... this was inadvertently left off of the sample permit provided.

CUPA's 6th Status Update: [Enter Update Here](#)

5. **Deficiency:** The CUPA does not approve and/or review monitoring, response and plot plans for accuracy and/or applicability. When the application for the UST permit is submitted, data entry is performed and the forms filed. The UST inspector prints out a summary of information prior to the UST program inspection, but it does not include the specific tank or piping information, monitoring information, financial responsibility information, etc. The information located at the facility is not compared to what has been submitted.

Preliminary Corrective Actions: Provide a procedure to ensure that all of the permitting information has been submitted, reviewed for completeness and approved. Verify that it is accurate for the facility. During an inspection compare what is submitted to the information located at the facility.

CUPA's 3rd Status Update: The inspectors will review the permitting information for completeness, and will verify that it is accurate for the facility. During the inspection the inspector will compare what is submitted to the information located at the facility.

Cal/EPA's 3rd Response: Cal/EPA considers this deficiency corrected.